

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: _____)
SHARONN E. THOMAS, _____) Chapter 7
Debtor. _____) Case No. 18-17430 (ELF)

_____)

RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Sharonn E. Thomas (the “Debtor”), by and through her undersigned attorneys, respectfully submits this Response to Motion of Nationstar Mortgage, LLC as Servicer for the Bank of New York Mellon f/k/a the Bank of New York as Trustee for First Horizon Alternative Mortgage Securities Trust 2006-FA2 for Relief from the Automatic Stay under Section § 362(d) (the “Motion”) filed by Nationstar Mortgage LLC (the “Movant”) and states as follows:

1. Admitted.
2. Admitted.
3. Admitted in part, denied in part. Admitted that Nationstar Mortgage services the loan. The Debtor is without information to admit or deny the remainder of paragraph 3; therefore, such allegations are denied.
4. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 4 of the Motion; therefore, such allegations are denied.
5. Admitted.
6. The allegations contained in paragraph 6 of the Motion constitute a conclusion of law to which no response is required.
7. Admitted. The Debtor reserves the right to amend her stated exemptions.
8. Denied. The Debtor has made all post-petition monthly mortgage payments.

9. Denied. There is no current default under this Mortgage. Any default that may have existed on the date the Motion was filed, based on information and belief, has been cured.

10. Admitted to the amount of the schedules. The Defendant is without information to admit or deny the remaining allegations set forth in this paragraph 10 of the Motion.

11. Denied. Movant is adequately protected given the fact that it possesses a substantial equity cushion over its loan as set forth on the Debtor's schedules and the Debtor has cured any arrears existing on the Mortgage.

12. Denied. The Movant has not articulated any reason why a waiver of Rule 4001(a)(3) is necessary or appropriate.

13. The documents referenced in this paragraph speak for themselves and the Debtor.
WHEREFORE, the Debtor respectfully requests that the Court deny the Movant's Motion.

Dated: March 26, 2020

FLASTER/GREENBERG P.C.

By: /s/ Damien Nicholas Tancredi, Esq.
Damien Nicholas Tancredi, Esq.
1835 Market Street, Suite 1050
Philadelphia, PA 19103
Counsel for Debtor, Sharonn E. Thomas